

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.,
CUSTOMER DATA SECURITY
BREACH LITIGATION**

No. 19-md-2904 (MCA) (MAH)

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION OF
JOSEPH J. CAVANAUGH, ESQ.**

*This Document Relates To:
All Actions*

TO: All Counsel of Record

PLEASE TAKE NOTICE that on February 3, 2025, at 9:00 a.m., or as soon thereafter as counsel maybe heard, pursuant to L. Civ. R. 101(c), the undersigned attorney for Defendants Laboratory Corporation of America Holdings and Laboratory Corporation of America, shall move before the United States District Court, District of New Jersey, Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order admitting Joseph J. Cavanaugh, Esq., to appear *pro hac vice* in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that in support of said application, Laboratory Corporation of America Holdings and Laboratory Corporation of America shall rely on the accompanying declaration of Joseph J. Cavanaugh, Esq., and that counsel for Laboratory Corporation of America Holdings and Laboratory Corporation of America confirmed via e-mail on January 10, 2025, that Plaintiffs consent to and do

not oppose this *pro hac vice* Motion. A proposed order is also attached hereto.

LOCAL CIVIL RULE 7.1 STATEMENT

The undersigned hereby certifies that, to the best of his knowledge, no brief or memorandum of law is necessary in support of this motion as the issues raised thereby involve no complicated issues of law.

Dated: January 10, 2025

/s/ *Edward J. Fanning, Jr.*

Edward J. Fanning, Jr.

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